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March 22, 2022

The Honorable May Kay Vyskocil  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
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VIA ECF

Re: *Tavarez v. FCA US LLC*, Case No. 1:21-cv-09825 (MKV)

Dear Judge Vyskocil:

We represent plaintiff Victoriano Tavarez (“Plaintiff”) in the above-referenced class action. We respectfully write pursuant to this Court’s Individual Rules of Practice in Civil Cases 2(G) to request a brief adjournment of six days for Plaintiff to file its opposition to Defendant’s motion to dismiss.

Defendant filed its motion to dismiss the first amended Class action complaint on March 9, 2022. *See* Docket No. 21. Defendant’s opposition would be due on March 23, 2022. Plaintiff respectfully requests that its time to file an opposition be extended six days to March 29, 2022 to allow ongoing settlement negotiations to continue. This is Plaintiff’s first request for an extension, and Defendant does not oppose this request to the Court. Defendant’s time to file any reply to the opposition would likewise be extended by six days.

Respectfully submitted,  
/s/ William J. Downes  
William J. Downes, Esq.

Cc: All Counsel of Record (via ECF)

**Granted. SO ORDERED.**

Date: March 24, 2022  
New York, New York

Handwritten signature of Mary Kay Vyskocil in black ink.  
Mary Kay Vyskocil  
United States District Judge